

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

BVG PROPERTIES, LLC, et al.,	)	CASE NO.: 1:25:CV-00430
	)	
	)	
Plaintiffs,	)	JUDGE PAMELA A. BARKER
	)	
vs.	)	
	)	
CITY OF CLEVELAND, et al.,	)	
	)	
Defendants.	)	

**PLAINTIFFS' MOTION FOR CLARIFICATION**

Now comes Plaintiffs, BVG Properties, LLC, 7006 Detroit LLC and 1415-1419 West 101 LLC, by and through the undersigned counsel, and respectfully requests this Honorable Court to grant Plaintiffs' Motion to Exceed Page Limitation. A memorandum in support is attached hereto.

Respectfully submitted,

/S/ SARAH S. GRAHAM  
Sarah S. Graham, Esq. (0070850)  
2 Summit Park Drive, #645  
Independence, Ohio 44131  
Telephone 216-264-4105  
Fax 216-264-4110  
[sgraham@aiyproperties.com](mailto:sgraham@aiyproperties.com)  
Attorney for Plaintiffs

**LOCAL RULE CERTIFICATION**

This case has not been assigned to a specific track as of May 21, 2025. This Motion is filed in compliance with Local Rule 7.

/S/ SARAH S. GRAHAM  
Sarah S. Graham, Esq. (0070850)

**CERTIFICATE OF SERVICE**

A copy of the foregoing Plaintiffs' Motion to Exceed Page Limitation was served via the Court's online filing system on May 21, 2025 to the following:

JR Russell, Esq.  
[jrussell2@clevelandohio.gov](mailto:jrussell2@clevelandohio.gov)

Gilbert Blomgren, Esq.  
[Gblomgren@clevelandohio.gov](mailto:Gblomgren@clevelandohio.gov)

William Menzalora  
[wmenzalora@clevelandohio.gov](mailto:wmenzalora@clevelandohio.gov)

/S/ SARAH S. GRAHAM  
Sarah S. Graham, Esq. (0070850)  
Attorney for Plaintiffs

**MEMORANDUM IN SUPPORT**

On April 28, 2025, Defendants City of Cleveland and Defendant Sally Martin aka Sally Martin O'Toole's ("Defendants") filed a Brief in Opposition to Plaintiffs BVG Properties, LLC, 7006 Detroit LLC and 1415-1419 West 101 LLC's ("Plaintiffs") Motion for Preliminary Injunction. During a phone status conference on May 12, 2025, this Court granted Plaintiffs until June 3, 2025 to file a Combined Reply in Support of their Motion for Preliminary Injunction and Opposition to Defendants' Motion to Dismiss that was filed on May 6, 2025.

Plaintiffs hereby request that this Court grant Plaintiffs' Motion to Exceed the Page Limitation for their Combined Reply. The page limitation is set forth in Local Rule 7.1(f). Plaintiffs submit that it is necessary to exceed the page limitation for reasons that include, but are not limited to, the fact that this is now a Combined Reply.

In light of the foregoing, Plaintiffs request that this Court grant its Motion for Extension of Page Limitation and allow Plaintiffs to file a Combined Reply with the memorandum up to 70 pages in length.

/S/ SARAH S. GRAHAM  
Sarah S. Graham, Esq. (0070850)  
Attorney for Plaintiffs